

MEMO ENDORSED

O'REILLY & SHAW

Francis L. O'Reilly
Jane Ford Shaw

1735 Post Road, Suite 2C
Fairfield, CT 06824

P: (203) 319-0707
F: (203) 319-0128

June 30, 2022

The Hon. Nelson S. Román
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Deft's application to modify the conditions of her release to permit her to stay briefly with her family in a local hotel and then to stay with her sister until her new apartment is ready is GRANTED without objection by both the Gov't and Pretrial Services. Clerk of Court is requested to terminate the motion at ECF No. 87

Dated: White Plains, NY
June 30, 2022

Re: *United States v. Kayla Taylor*
Docket No. 7:20-CR-446-02 (NSR)

SO ORDERED:

HON. NELSON S. ROMÁN
UNITED STATES DISTRICT JUDGE

Dear Judge Román:

I am writing to request a modification of Ms. Kayla Taylor's conditions of release. Specifically, I am writing to request that Ms. Taylor's conditions of release be modified to permit her to stay briefly with her family in a hotel, and then to move into her sister's residence for approximately two weeks.

The basis for the instant request is that Ms. Taylor, who currently resides in an apartment with her mother, siblings, and infant child, will be moving with them to a new apartment in the coming weeks. However, that new apartment will not be ready for them to move in until July 14th. In the interim, though, the family's current lease is expiring and they have no place to go.

Accordingly, the family has arranged to spend the weekend in a local hotel: the Double Tree by Hilton at 425 East New York 59, Nanuet, New York, 10954. Then, the family will stay with Ms. Taylor's sister at 101 Kennedy Drive, Apartment 205, Spring Valley, NY 10977, until their new apartment is ready for occupancy.

I have conferred with counsel for the Government, AUSA Nicholas Bradley, who informed me that the Government has no objection to this request. I have also conferred with United States Probation Officer Vincent Adams, who has been handling Ms. Taylor's pretrial supervision, and who also has no objection to this request. Accordingly, I respectfully request that Ms. Taylor's conditions of release be modified to permit her to stay briefly in a local hotel and then to stay with her sister until her new apartment is ready.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 6/30/2022

Respectfully Submitted,

THE DEFENDANT
KAYLA TAYLOR

By: /s/ Francis O'Reilly

Francis L. O'Reilly
Fed. Bar No.: CT17505
1735 Post Road, Suite 2C
Fairfield, CT 06824
Phone: 203-319-0707
Fax: 203 319-0128